

**REMARKS**

Claims 1-26 are pending in the present application, of which claims 1, 12, 13 17 and 22 are independent. No amendments have been made. Applicant believes that the present application is in condition for allowance, which prompt and favorable action is respectfully requested.

**I. REJECTION UNDER 35 U.S.C. §102**

The Examiner rejected claims 1-4, 8-13, 17-20 and 22-26 under 35 U.S.C. §102(b) as being allegedly anticipated by U.S. Patent No. 5,432,510 issued to Matthews (hereinafter “Matthews”). The rejection is respectfully traversed in its entirety.

To anticipate a claim under 35 U.S.C. §102(e), the reference must teach every element of the claim and “[t]he identical invention must be shown in as complete detail as is contained in the ... claim.” (see MPEP §2131).

Matthews discloses a single hand data management device that has been ergonomically optimized to facilitate multiple key-per character data input in any language. (See Matthews, col. 5, lines 3-9). Matthews also discloses “Microwriting” in which specific keys are pressed in any order and a character is recorded only when all keys are released. “Microwriting” is stated to be the foundation for the disclosed invention. (See Matthews, col. 2, lines 3-20). Matthews does not teach every element of independent claims 1, 12, 13 17 and 22 in complete detail as is contained in the claims.

In particular, Matthews does not teach in complete detail “a processing circuit within a housing and coupled to a plurality of keys, the processing circuit being responsive to actuation of a selected combination of at least one key by generating data representing a character” as in independent claim 1.

Matthews does not teach in complete detail “a display for displaying a representation of said character represented by the data generated by the processing circuit, and wherein the processor is arranged to control the display to display an

indication of characters that will be input if a combination of one or more input keys is actuated by the user” as in independent claim 12.

Matthews does not teach “a processor, coupled to the input keys and to the display screen, for generating data representing symbols for display on the display screen, which symbols identify combinations of at least one input key corresponding to respective characters from a character set, the processor responding to simultaneous actuation of an identified combination by generating digital data representing the corresponding character displayed on the display screen” as in independent claim 12.

Matthews does not teach “data generating means for generating display data defining graphics identifying combinations of at least one of said user operable input means and a set of characters respectively associated with said combinations; and displaying means mounted to said housing and coupled to said processing means for displaying said graphics defined by said display data” as in independent claim 17.

Matthews does not teach “generating display data defining graphics identifying combinations of at least one of said input keys and a set of characters respectively associated with said combinations; and displaying said graphics defined by said display data” as in independent claim 22.

Also, claims 2-3, 8-11, 18-20 and 23-26 depend from and include all the elements cited in the independent claims 1, 13, 17 and 22, respectively. Accordingly, Applicant submits that these claims are believed to be allowable based on their dependency from an allowable base claim as well as other novel features included therein.

More particularly, Matthews does not teach “a lookup table defining a relationship between the generated data and the combinations of at least one key” as in dependent claim 9.

Matthews does not teach “wherein the relationship is defined for characters in an alphabetical order” as in dependent claim 10.

Matthews does not teach “wherein the relationship is defined for characters in a most frequently used letter order” as in dependent claim 11.

Matthews does not teach “wherein the data generating means is arranged to generate data for characters which are displayed in an alphabetical order” as in claim dependent 19.

Matthews does not teach “wherein the data generating means is arranged to generate data for characters which are displayed in a most frequently used letter order” as in dependent claim 20.

Matthews does not teach “wherein the display data is generated for characters which are displayed in an alphabetical order” as in dependent claim 24.

Matthews does not teach “wherein the display data is generated for characters which are displayed in a most frequently used letter order” as in dependent claim 25.

Since Matthews does not teach every element of the claims, Applicant respectfully requests a withdrawal of the rejection under 35 U.S.C. §102 for at least the foregoing reasons.

## **II. REJECTION UNDER 35 U.S.C. §103**

The Examiner rejected claims 14-16 and 21 under 35 U.S.C. §103 as being unpatentable over Matthews in view of U.S. Patent Application Publication No. 2002/0163504 filed by Pallakoff (hereinafter “Pallakoff”).

Applicant submits that claims 14-16 and 21 depend from and include all the elements cited in the independent claims 13 and 17, respectively. Accordingly, Applicant submits that these claims are believed to be allowable based on their dependency from an allowable base claim as well as other novel features included therein.

In addition, Applicant respectfully submits that there is no teaching or suggestion within the art to make the combination proposed by the Examiner. As aptly stated by the Federal Circuit in In re Kotzab, 2000 217 F.3d 1365; 55 USPQ 2d 1313, 1316 (Fed. Cir. 2000):

Most if not all inventions arise from a combination of old elements. Thus, every element of a claimed invention may often be found in the prior art. However, identification in the prior art of each individual part claimed is insufficient to defeat patentability of the whole claimed invention. Rather, to

establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant.

In this instance, the only motivation cited by the Examiner for combining the features of the cited references was that it would have been obvious to incorporate the teachings of Pallakoff into the apparatus of Matthews to provide the user with multifunction keys, thus minimizing the over-all apparatus. This is insufficient, as a matter of law, because it does not rely on the teachings of the references. Accordingly, Applicant respectfully submits that the Examiner has failed to set forth a prima facie case of obviousness and respectfully requests that the rejections of claims 14-16 and 21 be withdrawn.

Furthermore, even if the references could be combined, which Applicant maintains that they cannot, the resulting combination fails to teach or suggest the claimed subject matter as set forth in claims 14-16 and 21.

Pallakoff teaches a hand-held device with multiple keys on its face and with one or more buttons on its side. (See Pallakoff, paragraph 15). Pallakoff does not teach every element of claims 14-16 and 21.

In particular, neither Matthews nor Pallakoff discloses “the processor is arranged to generate data representing symbols identifying sub-sets of characters from the character set, and to respond to actuation of the jog key by outputting data so as to change the display screen from displaying symbols representing one sub-set of characters to displaying symbols representing another sub-set of characters” as in dependent claim 14.

Neither Matthews nor Pallakoff discloses “the processor is arranged to generate data representing symbols identifying sub-sets of characters which are displayed in an alphabetical order” as in dependent claim 15.

Neither Matthews nor Pallakoff discloses “the processor is arranged to generate data representing symbols identifying sub-sets of characters which are displayed in a most frequently used letter order” as in dependent claim 16.

Neither Matthews nor Pallakoff discloses wherein “the data generating means is arranged to generate data representing graphics identifying sub-sets of characters from a

character set, and to respond to actuation of the jog key by outputting data so as to change the display screen from displaying graphics corresponding to one sub-set of characters to displaying graphics corresponding to another sub-set of characters” as in dependent claim 21.

Since neither Matthews nor Pallakoff, separately or combined, teach or suggest the claimed subject matter, Applicant respectfully requests a withdrawal of the rejection under 35 U.S.C. §103 for at least the foregoing reasons.

### **III. ALLOWABLE SUBJECT MATTER**

Applicant submits that claims 5-7 are allowable because they have not been rejected. Also, Applicant submits that claims 5-7 are allowable based on their dependency from an allowable base claim as well as other novel features included therein.

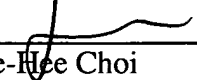
**CONCLUSION**

In light of the amendments contained herein, Applicant submits that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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